

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Gillman Capone, LLC
Marc C. Capone, Esq.
60 Highway 71, Unit 2
Spring Lake Heights, NJ 07762
Phone #732-528-1166
Email: bk@gilmancapone.com

In Re:

Virginia Karros

Case No.: 24-12353

Judge: Christine M. Gravelle

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for December 18, 2024, at 9:00am.

☐ Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

Unfortunately I do not qualify for a reverse mortgage given my age. I will be trying to meet with a realtor within the next few days as long as my health doesn't prevent me from doing so. I suffer from debilitating migraines and other issues. I would like the opportunity to list and sell the residence. I will be filing a modified Chapter 13 Plan. I am current with my Trustee payments.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 12/17/2024

/s/ Virginia Karros
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.